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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge
Mikell R. Scarborough, Circuit Court Judge

Case No. 2016-CP-10-02955
Appellate Case No. 2021-000272

TCC of Charleston, Inc.,

Appellant/Respondent,

v.

Concord and Cumberland, LLC, Concord & Cumberland HPR, Leo Hall, Diane Hall, Bea H. Smith, Margaret C. Pope, William D. Foster, Jr., Gene G. Foster, Mattison J. MacGillivray, Teresa MacGillivray, Pamela L. Vaughn, Nelia A. Patricio, Trustee of the Nelia A. Patricio Revocable Trust Agreement, Stuart D. Reeves, Edward T. Strom, Barbara K. Henderson, James R. Clarke, Paul A. Brim, Robert K. Seidl, Jennifer M. Seidl, Robert Kenneth Seidl, II, M. Bert Storey, Thomas R. Mather, Edward T. Strom, 304 Concord & Cumberland, LLC, Marion M. Simpson f/k/a Marion Moore McDonald Simpson, Kathy Gardner, Gregory J. Gardner, Freeman Waterfront Properties, LLC, Jo-Ann Cooper, Betty Y. Segal, Robert M. Levin, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam,

Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

PROOF OF SERVICE

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I, Edward D. Buckley, Jr., of Clement Rivers, LLP, counsel for Respondent Betty L. Beatty, do hereby certify that the foregoing **FINAL BRIEF OF RESPONDENT and RESPONDENT'S CERTIFICATION FOR FINAL BRIEF** were served on all other parties to this matter on December 17th, 2021, via email (see attached) to their counsel of record:

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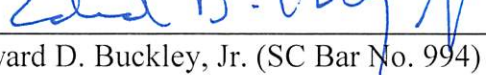
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Respectfully submitted,

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Charleston, South Carolina

Dated: December 17, 2021

Justman, Aimee

From: Justman, Aimee
Sent: Friday, December 17, 2021 2:11 PM
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Cc: Buckley, Edward D. (Ed); William Cole, Shannon; Hines, Russell; Bell, Pollyana (Polly)
Subject: TCC of Charleston v. Concord & Cumberland - Final Brief of Respondent Betty L. Beatty
Attachments: Final Brief.pdf; Certification for Final Brief.pdf

Please find enclosed the Final Brief and Certification for Final Brief of Betty L. Beatty which will be filed today.

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Subject: TCC of Charleston v. Concord & Cumberland - Final Brief of Respondent Betty L. Beatty
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